

**EXHIBIT 76**

**REDACTED**

**MAO DECLARATION  
OPPOSITION TO SUMMARY  
JUDGMENT**

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, JULIEANNA )  
MUNIZ, ELIZA CAMBAY, SAL ) Case No.:  
CATALDO, EMIR GOENAGA, JULIAN ) 3:20-cv-04688  
SANTIAGO, HAROLD NYANJOM, KELLIE )  
NYANJOM, and SUSAN LYNN HARVEY, )  
individually and on behalf of all )  
others similarly situated, )  
Plaintiffs, )  
vs. )  
GOOGLE LLC, )  
Defendant. )  
-----)

\*\*\*HIGHLY CONFIDENTIAL - ATTORNEYS EYES ONLY\*\*\*

REMOTE PROCEEDINGS OF THE  
VIDEOTAPED DEPOSITION OF STEVE GANEM  
FRIDAY, OCTOBER 28, 2022

REPORTED BY NANCY J. MARTIN  
CSR. NO. 9504, RMR, RPR  
CLAUDIA R. GARCIA, CSR. 12812  
JOB No. 5554575

PAGES 1-325

Page 1

1 Q Got it. Can you go on to the next page.

2 MR. SANTACANA: The end of that answer cut out  
3 for me. I don't know if cut out for you, Claudia.

4 THE WITNESS: It could be inserted into the  
5 logs if it passed those consent checks. 06:33:14

6 BY MR. MAO:

7 Q Mr. Ganem, if you go on to the next page, do  
8 you see that diagram there on the bottom left of logs?  
9 It talks about 13 log sources and types, three  
10 protocols. 06:33:44

11 Do you see that there?

12 A Yes.

13 Q Do you know what those are, the 13 logs and  
14 three protocols?

15 MR. SANTACANA: Which page, Mark? 06:34:00

16 MR. MAO: This would be 14, which is Bates  
17 446.

18 MR. SANTACANA: Thanks.

19 MR. MAO: It's the little gray cylinder on the  
20 bottom left of that diagram. You probably have to 06:34:20  
21 expand it, Eduardo.

22 MR. SANTACANA: I got it. Thank you.

23 MR. MAO: Really hard to read it.

24 THE WITNESS: So I believe the three protocols  
25 are detailed right below the statement three protocols. 06:34:29

Page 222

1 BY MR. MAO:

2 Q Are those proto buffers, by the way, or are  
3 those protocols, or is that like somehow different than  
4 proto buffers?

5 A They are related. But I'm not sure if they 06:34:42  
6 are the same.

7 Q Okay. I presume that you can't enumerate the  
8 13 logs off the top of your head; right?

9 A I can't. Though I think earlier we  
10 identified, I believe, six for apps. And we hadn't 06:35:02  
11 discussed Google Analytics for the web, which I believe  
12 has other logs.

13 Q Sorry. Which document did we identify six?

14 A You may recall that earlier, when we went back  
15 on the record, we came back to you with more details 06:35:26  
16 regarding the logs after speaking to engineers.

17 Q I oh, see. That's what you're referring to.  
18 Sorry. I was confused. I thought maybe we were  
19 referring to a document that we had just looked at.

20 So can you confirm what those 13 are in terms 06:35:42  
21 of the ones that are for -- the ones that are listed  
22 there? And I appreciate you telling me which three  
23 protocols you're talking about, though.

24 MR. SANTACANA: So it sounds like outside  
25 scope as to the other seven, is what he's saying. 06:35:59

Page 223

1 MR. MAO: Well, he said he thinks. So I want  
2 to make sure.

3 BY MR. MAO:

4 Q I mean, you have a very easy way to verify  
5 that. It looks to me like the log sources, the 06:36:15  
6 details are there under eldar.corp.google.com?

7 MR. SANTACANA: Where? Oh, log, sources,  
8 details -- okay. We can try.

9 MR. MAO: I appreciate that.

10 MR. SANTACANA: Thanks for pointing that out. 06:36:32

11 MR. MAO: Yeah. I kind of make life easier  
12 for everyone.

13 BY MR. MAO:

14 Q Um, if you don't mind going -- turning back a  
15 little bit with me to 440, and you're going to have to 06:36:43  
16 really expand this here. That will be page 8 of the  
17 PDF. I have to magnify that a little bit.

■ [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED] [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED]

■ [REDACTED] [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

8 Q And those -- those bundles there appear to me  
9 to -- all three bundles, if you look at the last row,  
10 all seem to include IDFA/ADID and DSID as in those 06:38:35  
11 could actually be -- end up in the same bundle  
12 together; is that correct?

13 A IDFA and ADID would never be in the same  
14 bundle as each other.

15 Q Could either -- or sorry. 06:38:58  
16 Can they though however be in the same bundle  
17 as the DSID?

18 A IDFA and DSID would never be in the same  
19 bundle as each other. It's possible that ADID and DSID  
20 could be in the same bundle together. 06:39:21

21 Q Got it. And that's because on iOS, there is  
22 no DSID?

23 A That's correct.

24 Q Are any of these three pseudonymous IDs ever  
25 present in Google Takeout data? 06:39:41

1 MR. SANTACANA: Vague and outside scope.

2 THE WITNESS: Can you describe to me what you  
3 mean by Google Takeout data?

4 BY MR. MAO:

5 Q Do you know the function Google Takeout? It's 06:40:06  
6 a function you can do under My Account, where you can  
7 takeout -- my understanding is basically my account  
8 data. That's at least my understanding.

9 A I'm not familiar with it.

10 Q Got it. If you go down to 450, which is 06:40:33  
11 page 18 of the PDF. My main question there is: Where  
12 are UUIDs referenced in this chart?

13 A UUID referenced in this chart refers to the  
14 user ID feature of Google Analytics.

15 Q Are they present in the -- in the pseudonymous 06:41:43  
16 measurement logs?

17 A They can be depending on whether the customer  
18 is using that feature.

19 Q Got it. Are they different than PBIDs, the  
20 UUID? 06:42:32

21 A I'm not familiar with the PPID feature.

22 Q Got it.

23 MR. MAO: I introduced into exhibit a  
24 different one which is 224. If you don't mind pulling  
25 that up. 06:42:53

1 (Exhibit 224 was marked for  
2 identification and is attached  
3 hereto.)

4 THE WITNESS: Okay. I have it open.

5 BY MR. MAO: 06:43:32

6 Q My -- my question to you, Mr. Ganem, is do  
7 you -- do you know if this was ever launched?

8 A (No audible response.)

9 Q Perhaps, maybe -- maybe -- maybe let me ease  
10 this up a little bit. 06:44:09

11 I can't tell, but -- I can't tell if -- is  
12 this an earlier design for [REDACTED] or [REDACTED]  
13 [REDACTED]?

14 A I honestly have no idea what this is. Never  
15 seen it before. Never heard of the phrase, "unified ID 06:44:35  
16 linkage design."

17 Q Have you ever heard of [REDACTED], [REDACTED]  
18 [REDACTED]?

19 A It sounds familiar, but I don't -- I don't  
20 know what that is. 06:44:59

21 Q In -- in terms of the -- in terms of the WAA  
22 and sWAA control look up, do you know what process  
23 within Google looks that up?

24 MR. SANTACANA: Vague.

25 ///